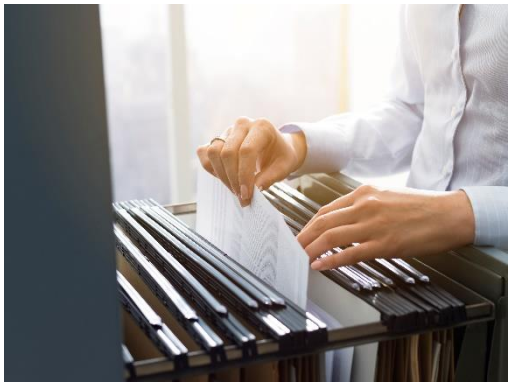
Global Data Protection and Privacy Policy

Introduction



Crawford & Company and its majority-owned and controlled subsidiaries (collectively "Crawford" or "the Company") have adopted this Global Data Protection and Privacy Policy ("Policy"). Crawford recognizes the importance of privacy and security and is committed to complying with applicable Data Protection Laws and Client contractual requirements in handling Personal Data.

Policy

Purpose

Although Data Protection Laws vary by jurisdiction, all Crawford Personnel should be aware that laws exist to protect the privacy and security of Personal Data, and these laws impact the manner in which Crawford and its Personnel use, access, disclose, or otherwise Process such information.

This Policy:

- Sets forth the principles that apply to the Processing of Personal Data by Crawford, and describes how Crawford adheres to these principles; and
- Provides an overview of Crawford's privacy governance structure, and the roles and responsibilities of key individuals and groups in carrying out Crawford's privacy compliance obligations and tasks.

This Policy will be supplemented by additional policies, procedures and guidelines, to address specific areas, jurisdictions, laws and requirements.

Scope

This Policy applies to all Personal Data that is Processed by Crawford as a Data Controller or a Data Processor, including relating to its Personnel, Clients, Claimants, Vendors, and other parties. All Personnel are required to adhere to this Policy. Personnel that violate this Policy may be subject to disciplinary action up to and including termination, subject to applicable local law and employment terms.

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All Personnel have an important role to play in the proper management and safeguarding of Personal Data, in identifying data protection and data handling issues as they arise, and in escalating them immediately to the Global Privacy Office.

All Personnel are also expected to cooperate as necessary in implementing the principles, requirements, and key components of this Policy.

Principles

1. **Fair, Transparent and Lawful Processing**. Personal Data will be collected, stored and Processed fairly, lawfully and in a transparent manner. This means:
   - **1.1.** Individuals will be informed of the Processing (by the Data Controller).
   - **1.2.** Personal Data is Processed in accordance with the stated purposes for its collection or similar compatible purposes, and subject to a lawful legal basis such as consent where required by law.
   - **1.3.** Personal Data is not processed in ways that the Individual would not reasonably expect.
   - **1.4.** When acting as a Data Processor, Personal Data will only be Processed as necessary for performing the services acting under the instruction of Clients, or where otherwise required by applicable law.

2. **Data Minimization**. Personal Data will be collected only where reasonable and necessary for the stated purposes for which it is being Processed, and will be adequate, relevant, and limited to what is necessary in relation to those purposes.

3. **Purpose Limitation**. Personal Data will be Processed for specified, explicit, and legitimate purposes, and in a manner compatible with the purpose for which the Personal Data was initially collected. Personal Data may be de- identified to render it Anonymous Data, which may then be used for the limited purposes of improving Crawford's services and operations, modelling, trend analysis, market research, analytics, research and related administrative purposes.

4. **Accuracy**. Personal Data will be accurate and up-to-date.
   - **4.1.** Reasonable steps will be taken to ensure the accuracy of Personal Data obtained.
   - **4.2.** Inaccurate Personal Data (considering the purposes of its Processing) will be erased or rectified.

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5. **Limited Retention**. Personal Data will be retained only for as long as is necessary to achieve the specified purpose(s), subject to applicable Data Protection Laws, Crawford policies and Client contractual requirements.

6. **Security and Integrity**. Taking into account the state of the art, the costs of implementation, and the nature, scope, context and purposes of Processing appropriate organizational, administrative and technical security measures will be in place to safeguard the Personal Data, provide for secure Processing of Personal Data, and to identify, prevent, detect, and mitigate risks to Personal Data and the systems, tools, and processes used to Process Personal Data.
   - **6.1.** Personal Data will be Processed in a manner that provides for appropriate security of the Personal Data.
   - **6.2.** Security measures must be designed and implemented to safeguard against unauthorized and unlawful Processing, and accidental loss, destruction or damage of Personal Data and related systems.
   - **6.3.** Controls will be designed and implemented to detect, mitigate, and remediate security events and incidents.
   - **6.4.** Policies and procedures will be established so that event, security incidents, and privacy incidents are promptly reported internally, and investigated, assessed, and handled in accordance with the established Data Protection Laws where they may impact Personal Data or related Processing activities.

7. **Privacy-by-Design (PbD)**. Activities and processes will be designed, implemented, and carried out in a way that provides at the outset for compliance with the above principles and the integration of necessary safeguards for Personal Data.

8. **Accountability**. Appropriate technical and organizational measures will be put in place to meet the requirements of accountability under applicable Data Protection Laws (including but not limited to the GDPR, UK GDPR and PIPEDA) these include but are not limited to the following:
   - Adopting and implementing data protection policies;
   - Taking a 'data protection by design and default' approach;
   - Putting written contracts in place with organizations that process personal data on your behalf;
   - Maintaining documentation of your processing activities;
   - Implementing appropriate security measures;
   - Recording and, where necessary, reporting personal data breaches;
   - Carrying out data protection impact assessments for uses of personal data that are likely to result in high risk to individuals' interests;

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- Appointing a data protection officer; and
- Adhering to relevant codes of conduct and, as applicable, signing up to certification schemes.

Compliance with these principles will be assessed, and Processing activities will be conducted in a manner that demonstrates compliance and can be audited and assessed.

8.1. Inquiries and complaints related to Personal Data Processing will be assessed, responded to, and resolved (where possible) fairly and without undue delay.

8.2. Reasonable processes for receiving, handling, and responding to questions, requests and complaints from individuals and Clients are established, to provide for fair, timely, consistent, and lawful responses.

8.3. Accurate records of Processing activities will be maintained, including records of security incidents, complaints, Data Subject rights requests and other mandatory records under applicable Data Protection Laws.

Key Privacy Compliance Components

In order to comply with the principles set forth above, Crawford will take steps to ensure that these principles are addressed within all relevant business processes and activities, and to implement certain processes and procedures, which includes the following key components, each of which is addressed below in this Policy:

- Notice to Individuals
- Legal Basis of Processing
- Recordkeeping (and Records of Processing)
- Data Subject Rights/ Individual Rights Management
- Third Party Risk Management
- Incident Response
- Privacy Awareness and Training
- Privacy Impact Assessments
- Ongoing Assessments and Audits
- Governance

Notice to Individuals

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Crawford will inform Data Subjects of the collection and use of their Personal Data (as required by applicable Data Protection Laws), including notice of the following: the types of Personal Data collected, the purposes of the Processing, Processing methods, the Data Subjects' rights with respect to their Personal Data, the retention period, international data transfers, if data will be shared with third parties and the Company's security measures to protect Personal Data.

For Personnel, this information will be set forth in an employee privacy notice and additional notices, as required under applicable Data Protection Law. Where applicable, employee privacy notices will be provided to new employees during onboarding and a copy of the privacy notice will also be posted online where possible, and available through local human resources contacts. Employees will be notified and provided with a copy of applicable employee privacy notices whenever material changes are made.

For Clients, Vendors and other relevant third parties, a privacy notice should be provided or made available in a retrievable and an easily accessible manner, where practicable at the point of the collection of Personal Data or as soon thereafter as is reasonable.

Legal Basis of Processing

Personal Data may only be collected and Processed by Crawford in compliance with applicable Data Protection Laws, and where required with the consent of the Data Subject. When acting as a Data Processor, Personal Data will only be Processed as necessary for performing the services as directed by Clients, or where otherwise required by applicable law. Where permitted by the contract and not prohibited by law, Client Personal Data may be anonymized, which may then be used for the purposes of improving Crawford's services and operations, developing new services and offerings, and modelling, trend analysis, market research, analytics, research, and related purposes. Crawford and Crawford Group Members may maintain anonymous data as part of its or their own information or data, and such data shall no longer be subject to any Client Agreement or contract.

Whenever Personal Data Processing is based on the Data Subject's explicit consent, a record of such consent must be made and maintained along with a readily available manner to revoke such consent.

Personal Data that is subject to Data Protection Laws may only be Processed pursuant to specific lawful basis under the law. Where Crawford is the Data Controller, it is responsible for ensuring that the Processing is conducted pursuant to one or more specific legal bases (e.g., consent, necessary to perform contract with

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individual, legitimate business purpose, insurance purposes, required by law, necessary to defend legal rights) and that the legal basis has been disclosed to Data Subjects in the relevant privacy notice.

Recordkeeping

Crawford will maintain accurate records of its Processing activities, including mandatory records as set forth in applicable Data Protection Laws. The Global Privacy Office will maintain a data inventory/record of processing of Crawford's Processing of Personal Data as required under Data Protection Laws. The Group Data Protection Officer is responsible for ensuring that the record of processing is updated as appropriate. Relevant business owners are responsible for alerting the Global Privacy Office of changes to Processing activities.

Disclosure

In performing services or providing support Crawford may disclose Personal Data to Crawford group companies, clients and third parties including service providers engaged by Crawford or its clients to perform services or related functions as part of claims handling services.

Data Subject Rights

Data Subjects have specific rights related to their Personal Data and how it is Processed. Data Subjects will be provided with a reasonable mechanism to enable them to access their Personal Data, to exercise any other applicable rights, such as the right to update, rectify, erase, restrict, withdraw consent or transmit in portable form their Personal Data, if appropriate or required by law ("Data Subject Rights"), and to inquire or submit a complaint related to the Processing of their Personal Data.

Data Processor

When acting as a Data Processor, Crawford will, in accordance with applicable laws and contractual requirements, notify the Data Controller of any Data Subject requests to exercise their Data Subject Rights, make an inquiry, or file a complaint and provide reasonable support upon request to enable the Data Controller to respond to the request as required by Data Protection Laws.

Data Controller

When acting as a Data Controller, Crawford is responsible for respecting Data Subject Rights and responding to related requests, inquiries, or complaints as required by Data Protection Laws. The Chief Privacy Officer or a

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delegate will provide guidelines for responding to such requests; all Personnel are responsible for following such guidelines and responding to such only as determined by prior protocol.

Cross-border transfers of Personal Data

Applicable Data Protection Laws and Client commitments may require Crawford to take steps to protect Personal Data before it transfers the Personal Data out of the country from which it is collected. Data transfers include both storing data outside the home country's border (or home region), but also accessing information within the home country from outside that country (or region).

Equivalent Protection

Crawford must take steps to ensure that cross-border transfers of Personal Data are subject to adequate safeguards. Personal Data that is transferred cross-border must be Processed by or on behalf of Crawford in accordance with applicable Data Protection Laws and Client commitments.

Restricted Transfers

Restricted Transfers of Personal Data must be carried out in accordance with applicable Data Protection Laws and Client commitments.

In order to properly Process such Personal Data, Crawford has adopted various measures, to ensure that Personal Data is adequately protected when transferred outside the jurisdiction from which it was collected.
Where there is any Restricted Transfer of Personal Data, adequate safeguards will be used, including the execution of the Standard Contractual Clauses where relevant. Crawford will assess whether any authorization from relevant regulatory authorities or Clients is necessary.

The Global Privacy Office will determine what approved data transfer mechanisms are appropriate for the given Processing activities.

Transfers amongst Crawford Group entities

Crawford has executed an Intra Group Data Processing Agreement, which incorporates the Standard Contractual Clauses, in order to provide adequate safeguards for Restricted Transfers amongst Crawford group entities, as well as other Processing of Personal Data by one or more Crawford group entity on behalf of one or more other Crawford group entity.

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Each Crawford group entity will sign onto the Intra Group Data Transfer Agreement and comply with the Intra Group Data Transfer Agreement with respect to any transfers or Processing amongst Crawford group entities. As new entities become part of Crawford, each new entity will be required to sign onto the Intra Group Data Transfer Agreement.

Transfers to Vendors

Before any Restricted Transfer to a Vendor occurs, Crawford will take steps to incorporate the Standard Contractual Clauses (or other appropriate data transfer mechanism) into the applicable contractual agreement between Crawford and the Vendor.

Third Party and Vendor Management

Business relationships with and engagement of third parties must be conducted in a manner that complies with this Policy and applicable Data Protection Laws and Client commitments.

Where Personal Data is involved, Vendors and Subprocessors may only be engaged if they are capable of meeting adequate standards and providing appropriate safeguards for Personal Data.

At a minimum:
Appropriate due diligence should be conducted of all Vendors and Subprocessors, prior to their Processing of Personal Data (including storage or access), and on an ongoing basis thereafter as needed (subject to the Crawford third party risk management program).

Appropriate contractual obligations must be implemented with each Vendor, which include (where relevant) contractual obligations that are equivalent to those which apply to Crawford under its relevant Client contracts.

Crawford must take steps to incorporate appropriate data transfer mechanisms, such as explicitly the Standard Contractual Clauses into the applicable contractual agreement between Crawford and the Vendor, if there may be any Restricted Transfer.

All necessary steps under applicable Data Protection Laws and Client contractual commitments will be completed.

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Vendors and other third parties must be assessed, engaged and managed in accordance with the Crawford third party risk management program (TPRM).

Incident Response

Adequate controls are necessary so that security incidents that may impact Personal Data are detected, reported, and handled in accordance the established policies and procedures, including the Security Incident Response Policy, and applicable Data Protection Laws.

When a security event or a security incident may impact Personal Data or indicate a violation of this Policy, Data Protection Laws or Client commitments, the Global Privacy Office must be promptly notified.

The Chief Privacy Officer, in coordination with the General Counsel, is responsible for assessing, investigating, and determining the response and notification obligations arising out of a privacy event or privacy incident, and all Personnel are required to cooperate with the Privacy Office as necessary to assess, investigate, mitigate, report, and resolve privacy events and incidents. The Global Privacy Office has authority to recommend a determination that a privacy event or incident is a Data Breach; Personnel should not speculate or identify any incidents as Data Breaches unless directed to by the Global Privacy Office, Chief Information Security Officer, or the General Counsel.

Where a Data Breach is determined as set forth in the Security Incident Response Policy, Crawford must act promptly to provide any required notice to relevant Clients, regulatory authorities, and Data Subjects.

Privacy Training and Awareness

Privacy governance and data protection are critically important to Crawford, and its ability to:

- Comply with laws and Client contractual commitments
- Control risks
- Maintain trust
- Operate effectively
- Support strategic goals and data governance model

Annual Training

Mandatory privacy and security training will be required for all Personnel at least annually regarding privacy, data protection, and information security.

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Additional Role-based and Jurisdictional Training

Personnel with roles that involve regular handling of Personal Data and those with specific key responsibilities within the privacy governance structure will receive additional role-based training and resources, as appropriate.

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Embedded Privacy Resources

Privacy coordinators will be identified across the company to support privacy initiatives, raise awareness amongst colleagues and liaise with the Global Privacy Office.

Privacy Impact Assessments

It is critically important that activities and processes are designed, implemented and carried out in a way that provides for compliance with Data Protection Laws and Crawford policies and the integration of necessary safeguards for Personal Data. This is a key component of the privacy-by-design principle (see Principle 7 above). Crawford has developed a policy and procedures for conducting privacy impact assessments, and where necessary, formal data protection impact assessments.

Privacy Impact Assessments

Privacy Impact Assessments (PIA) must be conducted to assess the privacy impact of and identify risks related to projects, activities and Vendors that may impact the privacy and security of Personal Data. Prior to engaging a new Vendor, starting a new project, designing or materially updating a new system, combining data from two systems or record sets, or otherwise engaging in any new or substantially changed activity or process that may impact Personal Data or how it is Processed, a PIA must be conducted.

Data Protection Impact Assessments

Where a PIA indicates that the Processing of Personal Data is likely to result in a high risk to individuals' rights and freedoms as defined under applicable Data Protection Laws, a formal data protection impact assessment (DPIA) will be conducted prior to such Processing, in order to determine the nature of those risks and mitigate such risks to the extent possible. Such Processing may not begin until the Chief Privacy Officer has determined that the risks from the Processing have been adequately mitigated.

Ongoing Assessment and Updates

Ongoing risk assessments will be conducted of relevant business processes and systems will be conducted to:

- Verify that internal controls, policies and procedures are in place and being followed and
- Identify any compliance gaps.

Privacy compliance processes and procedures will be updated to account for:

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- New threats or risks to the business that have been identified;
- Changes to operations and activities;
- Changes in privacy laws; and
- Areas for improvement based on risk assessment results, PIA, audits, complaints, lessons learned from incident response efforts, and/or other means.

Governance

Global Privacy Office

Crawford has established a Global Privacy Office, which is designed to develop, manage, and drive enterprise-wide privacy initiatives. At a high level, the Global Privacy Office:

- Initiates and fosters a culture of privacy within Crawford;
- Ensures that privacy is included in business objectives and goals; and
- Manages compliance in a complex regulatory environment.

The Global Privacy Office carries out the above with input from and collaboration with various functions within Crawford, such as Legal, Ethics & Compliance, Information Technology, Human Resources, and Information Security.

Chief Privacy Officer

The Chief Privacy Officer leads the Global Privacy Office and has overall responsibility and accountability for privacy within Crawford. This includes:

- Developing and maintaining this Policy and supporting policies and procedures;
- Setting the direction and priorities for Crawford's privacy compliance program, including implementation of enterprise-wide privacy objectives; and
- Management of budget and resources (including Data Protection Officers).

Global service lines, departments and local entities are accountable for initiation and implementation of the enterprise-wide privacy objectives in consultation with the Chief Privacy Officer.

Data Protection Officers and Data Privacy Officers

Crawford has created additional roles with formal responsibility for compliance with Data Protection Laws in specific regions and jurisdictions, as set forth below. Crawford will appoint individuals to these roles. These

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individuals are accountable to the Chief Privacy Officer regarding their relevant duties to oversee compliance with this Policy, related data protection policies and procedures and applicable Data Protection Laws.

European Union and United Kingdom

The Data Protection Officer is a statutory role required by UK and EU Data Protection Laws under certain conditions. Crawford will establish one or more Data Protection Officer roles with responsibility for Data Protection Laws in a particular jurisdiction or on behalf of the Crawford group.

Group Data Protection Officer. The Group Data Protection Officer has responsibility for monitoring and advising on Crawford's compliance with the Data Protection Laws, as well as assisting with the regular update of the mandatory records of Processing and providing input on mandatory DPIAs. The Group Data Protection Officer will be a member of the Global Privacy Office, and report to the Chief Privacy Officer, but must be able to exercise his/her duties independently. The Group Data Protection Officer will be supported by local Privacy Leads in the UK and relevant EU jurisdictions.

Country Data Protection Officer. As required by applicable Data Protection Laws a country-specific Data Protection Officer may be internally or externally appointed and will have responsibility for data protection compliance in a particular jurisdiction and report directly to the Country Manager for that jurisdiction and indirectly report to the Global Privacy Office.

Each Data Protection Officer that is appointed will be subject to terms that guarantee his/her independence and impartiality. The Data Protection Officer's role is not commercial, and the Data Protection Officer must not be put in a situation (e.g., through the assignment of additional responsibilities) that might create a conflict of interest.

Each Data Protection Officer will have independence to carry out his/her statutory duties, and to report on matters related to compliance with Data Protection Laws to the highest levels of management as follows:

The Group Data Protection Officer can communicate matters related to compliance with Data Protection Laws to the Global Executive Management team.

A country-specific Data Protection Officer can communicate matters related to compliance with Data Protection Laws in a particular jurisdiction to the Country Manager for that jurisdiction.

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An up-to-date record of the current Data Protection Officer appointees, as applicable will be maintained by the Privacy Office and must also be disclosed in relevant Data Subject privacy notices and notified to the relevant supervisory authorities as required by applicable Data Protection Laws.

The Philippines

A Philippine Data Protection Officer is required for each Crawford Philippine entity. A Philippine Data Protection Officer may be appointed for one or more Philippine entities and will have responsibility for overseeing compliance with Philippine Data Protection Laws and submitting any registrations required under applicable Data Protection Laws to the Philippine National Privacy Commission. A Compliance Officer for each Philippine entity may be appointed to support the Philippine Data Protection Officer. The current Data Protection Officer for each Philippine entity will be notified to the Philippine National Privacy Commission.

Canada

The Canadian Data Privacy Officer will be appointed for one or more Canadian entities as required under Canadian Data Protection Laws and will have responsibility for overseeing compliance with Canadian Data Protection Laws.

Other Jurisdictions

Where required by applicable Data Protection Laws, Crawford will designate additional roles with formal responsibility for privacy and data protection in particular jurisdictions, who will be accountable to the Chief Privacy Officer regarding their relevant duties to oversee privacy compliance.

Privacy Coordinators

Unless an exception is granted by the Global Privacy Office, each Affiliate and each global department may assign a Privacy Coordinator who is responsible for being a shared point of contact between the Global Privacy Office and its entity or department, and for identifying on-the-ground compliance issues and escalating these to the Global Privacy Office and assisting the Global Privacy Office in implementing privacy initiatives. The Privacy Coordinators are accountable to the Chief Privacy Officer regarding their relevant responsibilities.

Definitions

"Client" means a current, prior, or prospective client of Crawford, and any other party upon whose behalf Crawford acts at the direction of such client.

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"Client Personal Data" means Personal Data that Crawford Processes (as a Data Processor, Data Controller or Joint Controller) on behalf of its Clients.

"Data Breach" means any known or reasonably suspected unauthorized access to, use, disclosure, or other Processing of Personal Data, as well as any loss, theft or acquisition of Personal Data, or any incident that compromises the security or availability of Personal Data or systems that Process Personal Data.

"Data Controller" or "Controller" or "Independent Controller" means the natural or legal person/entity that alone or jointly with others, determines the purposes and means of the Processing of Personal Data.
"Data Processor" or "Processor" means the natural or legal person/entity that Processes Personal Data on behalf of the Controller.

"Data Protection Laws" means, to the extent applicable to Crawford, the laws, rules and regulations regarding privacy and data protection or otherwise governing the Processing of Personal Data (including, but not limited to USA, UK, Australia, Brazil, Canada, Chile and EU Data Protection Laws).

"Data Subject" means the individual to whom the Personal Data relates. "EEA" means the European Economic Area.

"EU Data Protection Laws" means domestic legislation of each Member State of the European Union ("EU") and as amended, replaced or superseded from time to time, including by the EU General Data Protection Regulation 2016/679 ("GDPR") and laws implementing or supplementing the GDPR.

"GDPR" means the General Data Protection Regulation, whether under the European Union or the United Kingdom.

"Personal Data" means any information relating to an identified or identifiable natural person; it includes information in any format or media, regardless of whether the information is encrypted. A person may be directly identifiable via their name, address, employee ID, claim number, email address, phone number or government identifier, for example. A person may be indirectly identifiable through linking or combining additional information that may or may not be in Crawford's custody or control with information in Crawford's custody or control, such as

an IP address, MAC address, device identifier, biometric identifier, or other unique identifier, geolocation information, genetic information or DNA, for example.

"Personnel" means all full-time, part-time, temporary, regular and contract employees, consultants, and non-employee workers.

"PIPEDA" means the Canadian Personal Information Protection and Electronic Documents Act.

"Process", "Processed" or "Processing" means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of the data.

"Restricted Transfer" means a transfer of Personal Data by, among, or to Crawford (including any Crawford group entities) across national borders that is prohibited by applicable Data Protection Laws or Client agreements, in the absence of the Standard Contractual Clauses.

"Sensitive Personal Data" means Personal Data that is considered sensitive or otherwise subject to heightened regulatory standards under Data Protection Laws (including "special categories of Personal Data" under EU Data Protection Laws), and Personal Data that, if accessed or disclosed without authorization, could lead to identity theft or material financial, physical or reputational harm, as well as including: race or ethnicity; religious or philosophical beliefs; trade union membership; political affiliation; sexual orientation or private life; health information, medical treatment; disability information; Protected Health Information; mental health; genetics; biometrics; credit card or financial account number; Payment Card Data; Social Security number or government identifiers; credit report or background checks; Personal Data from a known child; and criminal history or proceedings. Sensitive Personal Data includes any such data defined as sensitive under applicable laws.

"Standard Contractual Clauses" means:

(a) for Personal Data subject to EU Data Protection Laws, the EU standard contractual clauses for the transfer of Personal Data to Processors located in third countries, or any successor thereto or alternative data transfer mechanism, recognized by the European Commission pursuant to the GDPR (Articles 44-46); and/or

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(b) for Personal Data subject to Data Protection Laws other than EU Data Protection Laws, other national equivalents established to ensure adequate protection for cross-border transfers of Personal Data.

"Subprocessor" means a Vendor appointed by or on behalf of a Crawford entity (in their capacity as a Data Processor) which will Process Client Personal Data.

"UK GDPR" means the UK Data Protection Act of 2018 and related UK data protection legislation related to the GDPR regulations of the EEA.

"Vendor" means a third-party Data Processor (including a Subprocessor) that provides goods or services to a Crawford entity or to another entity or person on behalf of a Crawford entity.

Contact

The owner of this Policy is the Chief Privacy Officer. For more information, contact the Global Privacy Office (privacy@us.crawco.com).

Document Information

Document Name	**Global Data Protection and Privacy Policy**
Category	**Global Policy**
Related Policies	**All Crawford Policies and Procedures available on the Crawford intranet**
Version Number - Effective Date	**Version 1.0 – May 2018** **Version 2.0 – June 2020** **Version 3.0 – January 2022** **Version 4.0 – May 2023**

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Review and Approval Form:

Policy: Global Data Protection and Privacy Policy

Department	Name & Title	Signature	Date
Legal	K Royal, PhD Chief Privacy Officer	DocuSigned by: 76492B7C5C99444...	6/13/2023

Questions and Routing:

If you have any questions or changes to the policy, please contact the Global Compliance Office.

All completed forms to be sent to Global Compliance Office.